

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. S1-4:21CR00563MTS/NCC
	)	
HOWARD HUGHES,	)	
	)	
Defendant.	)	

**DEFENDANT’S FOURTH MOTION TO TRAVEL**

COMES NOW Defendant Howard Hughes, by and through his attorney Gregory N. Smith, and in support of said motion states as follows:

1. That the defendant and counsel have scheduled a meeting in-person in counsel’s office on August 4, 2023. Defendant is on bond living in Arkansas and believes the drive time to St. Louis is approximately 5 hours. Defendant and counsel believe an in-person meeting is necessary at this stage of the representation.

2. That Defendant is requesting that he be permitted to travel to St. Louis from Arkansas on August 4, 2023. Following his meeting with counsel, Defendant would spend the night at his cousin’s residence at 2655 Radcliffe Drive in Florissant, MO 63031. The Defendant’s cousin, Crystal Hughes, resides at this address. This is the same address that the Defendant stayed at when he was permitted to travel to meet with counsel in January of 2023. The Defendant further requests that he be permitted to return to his residence in Arkansas on August 6, 2023. The defendant would arrive in Arkansas before his curfew begins that night.

3. That counsel has discussed this request with Defendant's pretrial services officer, Talia McDaniel, in Arkansas. Ms. McDaniel has no objection to this request to travel. Counsel has further communicated this travel request to Toneta Dade in the Pretrial Services Office in the Eastern District of Missouri. Ms. Dade stated that Pretrial Services has no objection to the Defendant's travel request.

4. That counsel for the Defendant has likewise communicated this travel request to AUSA Geoff Ogden. Mr. Ogden has no objection to this request.

**WHEREFORE**, Defendant prays that this Honorable Court grant his Motion To Travel so that he can meet with counsel in his office in St. Louis and for any other further relief as this Court may deem just and proper in the premises.

Respectfully submitted,

/s/ Gregory N. Smith  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 20, 2023, I filed the foregoing in the above mentioned action with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following: Geoffrey Ogden, Assistant United States Attorney.

/s/ Gregory N. Smith